

2:25-cv-00815-CDS-EJY

FILED	RECEIVED
ENTERED	SERVED ON
COUNSEL/PARTIES OF RECORD	
MAY 09 2025	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY	DEPUTY

## Instructions: Writing and Filing a Civil Complaint

This Complaint template can be used by persons who are not incarcerated to file civil lawsuits in the District Court of Nevada. *Using this template does not guarantee any result in your case.*

### CHECKLIST: DOCUMENTS TO PREPARE

You need to file some official court forms with your complaint. *These forms are available* on the Court's website at <https://www.nvd.uscourts.gov/court-information/forms/>

☒ **Complaint** (see instructions below)

This is a *general* complaint template. Other types of complaint templates are available at the Legal Help Centers. Persons who are incarcerated must use a different, official Court form.

☐ **Civil Cover Sheet** (information form for the Court's internal records)

☐ **Summons with Proof of Service** (the Clerk must sign and stamp the summons you have prepared – the completed summons and complaint will be served on the defendant)

☐ **Application to Proceed in Forma Pauperis** (request that the court waive the \$402 filing fee, if you cannot afford to pay it)

### HOW TO COMPLETE THIS COMPLAINT TEMPLATE

1. **Know your deadlines.** You have limited time to file your complaint. If you are not sure of the deadline, seek out legal assistance.
2. **Provide basic information.** In the Complaint template, instructions are provided *in italics* to guide you. Please read these, as well as the section in the Handbook for Pro Se Litigants entitled, "Basic Procedures for Filing a Lawsuit," starting at page 15. Then initial pages of the Complaint, which provide the Court with information about you (the plaintiff) and the person or entity you are suing (the defendant), the law you are suing under, and why this Court is the correct one to decide this case.
3. **Write out the facts.** Write a short and simple description of what happened that caused you to file this case. Put each fact into a *separate, numbered* paragraph. It is usually best to write the facts in the order that they happened. Start with the earliest time and continue until the most recent event. Include *where* and *when* each event happened, *who* was involved, and *what role* each defendant played. If you need more pages for your facts, a blank page for copying is at the end of this packet.
4. **Write out the claims.** A "claim" explains what kind of legal right you are suing about. You may have one claim or several. For each claim, write in the law or right that was violated. Then, write in the name of the defendant who violated that law. Complete your claim by explaining what the law allows or doesn't allow, what the defendant did to violate that law, and the ways in which you were harmed by what the defendant did. Put each statement into a *separate, numbered* paragraph. You can briefly repeat facts from your statement of facts. You do not need to include legal arguments or case law.

5. You may attach documents to the end of this Complaint as exhibits, but it is not required. If you do attach an exhibit, explain what it is and how it supports your claim. Attaching a document to your Complaint does *not* necessarily mean that it will be accepted as evidence.
6. **Identify your demands.**
  - a. In the Demand for Relief section write in what you would like the Court to do for you.
  - b. If you would like to request a jury trial at the end of your case, check the boxes for Demand for Jury Trial on the first and last pages. Not all claims go to a jury trial.
7. **Number the pages.** Count the number of pages in your final Complaint. In the bottom left corner of each page, insert the page number and the total.
8. **Review and sign.** Read your Complaint, making sure all blanks are filled in, and to confirm that all of the statements are true. Each plaintiff must sign the complaint.

## FILING AND SERVING YOUR DOCUMENTS

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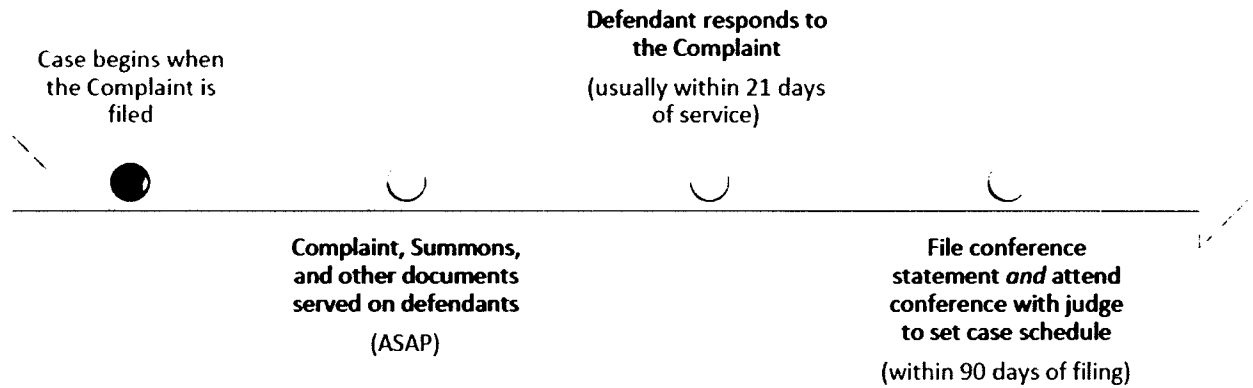
1. **Make two copies.** Once you have completely filled out and signed your Complaint, Civil Case Cover Sheet, Application to Proceed in Forma Pauperis (if needed), and prepared the Summons for the Clerk, make a copy of each document.
2. Deliver or mail the **original plus two copies** of each form to the Clerk's Office at the federal courthouse where you are filing your case. The Clerk will take the original and the other copy is for you to keep after it is stamped by the Clerk. If you file by mail, include a self-addressed, stamped envelope so that the Clerk can send a copy of each document back to you.
3. **Serve the Complaint.** Be sure that the Complaint, Summons, and the documents you received from the Clerk are served on each defendant.
  - a. If you filed an Application to Proceed in Forma Pauperis *and* it is granted, the Court will normally order the U.S. Marshalls to serve each defendant.
  - b. If you did *not* file an Application to Proceed in Forma Pauperis, you will need to have someone serve each defendant. For more information on service read Chapter 8 of the Handbook for Pro Se Litigants.

## STAY UP TO DATE

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1. **Tell the Court if you move.** File a notice with the Clerk if your mailing address, email, or phone number changes or you may miss important deadlines, causing you to lose your case.
2. **Check your mail.** Check regularly for documents from the Court or the opposing side.
3. A list of all of the documents that have been filed, and (usually) the documents themselves can be viewed online. Review the section on "Service of Process" of the Handbook for Pro Se Litigants that starts at page 22.
4. **Prepare for what's next.** A complaint only begins the process. There are other resources available, including the *Handbook for Pro Se Litigants*, to help you understand the next

steps in the lawsuit process. The Handbook is for people who are representing themselves and it explains basic court rules and procedures. It was prepared by the Court and is available at the Clerk's Office and on the Court's website.



Your Name:

Yvonne DeJesus

Address:

7089 N Aliante Pkwy #3023 N. Las Vegas

Phone Number:

702-321-0843

Fax Number:

N/A

E-mail Address:

dejesusyri3@gmail.com

Pro Se Plaintiff

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

Yvonne DeJesus

2:25-cv-00815-CDS-EJY

Plaintiff,

## COMPLAINT

vs.

Unitehealthcare Group  
9900 Bren Rd E  
Minnetonka, MN 55343

DEMAND FOR JURY TRIAL

Yes ☒ No ☒

Defendant.

## JURISDICTION

[Usually only two types of cases can be filed in federal court, cases involving "federal questions" and cases involving "diversity of citizenship." Check at least one box.]

1. My case belongs in federal court

☒ under federal question jurisdiction because it involves a federal law or right.

[Which federal law or right is involved?] Title VII of the Civil Rights Act of 1964

☐ under diversity jurisdiction because none of the plaintiffs live in the same state as any of the defendants and the amount of damages is more than \$75,000.

## VENUE

[Nevada is one "judicial district." Check the box for each venue option that applies.]

2. Venue is appropriate in this Court because:

- ☒ a substantial part of the events I am suing about happened in this district.
- ☒ a substantial part of the property I am suing about is located in this district.
- ☐ I am suing the U.S. government, federal agency, or federal official in his or her official capacity and I live in this district.
- ☐ at least one defendant is located in this District and any other defendants are located in California.

### INTRADISTRICT ASSIGNMENT

[This District has two unofficial divisions. One is the "Northern Division" covering northern Nevada including Carson City, Churchill, Douglas, Elko, Eureka, Humboldt, Lander, Lyon, Mineral, Pershing, Storey, Washoe and Whitepine counties at the courthouse in Reno. One is the "Southern Division" covering southern Nevada including Clark, Esmeralda, Lincoln, and Nye counties at the courthouse in Las Vegas.]

3. Because this lawsuit arose in Clark County, it should be assigned to the \_\_\_\_\_ Division of this Court.

### PARTIES

1. Plaintiff. [Write your name, address, and phone number. Add a page for additional plaintiffs.]

Name: Yvonne DeJesus

Address: 7089 N Aliant, Pkwy #3023 N Las Vegas NV 89084

Telephone: 702-321-0843

2. Defendants. [Write each defendant's full name, address, and phone number.]

Defendant 1:

Name: United HealthCare - Jennifer Quesenberry

Address: [if Defendant is an individual do not list home address, just use county and state]

Telephone: 1 800-328-5979

Defendant 2:

1 Name: \_\_\_\_\_  
 2 Address: [if Defendant is an individual do not list home address, just use county and state]  
 3 Telephone: \_\_\_\_\_  
 4 Defendant 3:  
 5 Name: \_\_\_\_\_  
 6 Address: [if Defendant is an individual do not list home address, just use county and state]  
 7 Telephone: \_\_\_\_\_

### STATEMENT OF FACTS

11 [Write a short and simple description of the facts of your case. Include basic details such as where  
 12 the events happened, when things happened and who was involved. Put each fact into a separate,  
 13 numbered paragraph, starting with paragraph number 6. Use more pages as needed.]

13 I was wrongfully terminated due to  
 14 racial discrimination, which is a violation  
 15 of Title VII of the Civil Rights Act of 1964.  
 16 Throughout my employment at UHC, I  
 17 encountered numerous instances of discriminatory  
 18 conduct from Jennifer Buesenberry. Such  
 19 as assigning 2 women of color to  
 20 do an Adherence Report. Where it only  
 21 took 1 non woman of color to do it!  
 22 Jennifer shared personal information  
 23 about her past being a drug addict and  
 24 being arrested. To make the people of  
 25 color to feel comfortable to share  
 26 personal information about themselves.  
 27 And several women of color did.  
 28

1 spinning light on their flaws etc.  
 2 I did not engage in this. ~~And~~ believe  
 3 the woman of color that ~~fell~~ fell for this  
 4 were then stereotyped. The people of color  
 5 including myself were assigned tasks  
 6 that were outside ~~the~~ of the scope of my  
 7 job descriptions. And required significantly  
 8 more time and effort. Especially while  
 9 doing the Adherence report. If Tereina  
 10 the other woman of color was out, late  
 11 or busy doing other tasks not in the job  
 12 description. I could not complete the  
 13 report. The white woman who trained  
 14 me for this task ~~and~~ had complete access  
 15 to all systems and applications to do it  
 16 all on her own. I asked, why I had to  
 17 do this task and was told it takes too long  
 18 to get access to the system. What does  
 19 this mean. Jennifer Q. knew my  
 20 employment was already limited? Yes  
 21 it was, as this was an insult to  
 22 2 intelligent Black women. Not  
 23 able to do 1 task it takes 1  
 24 white woman to do.

25  
 26 Also, Jennifer bragged how she  
 27 had gotten so many increases for  
 28 living cost. I had never received an  
 increase while employed at UHC.



## CLAIMS

## First Claim

(Name the law or right violated: Title VII of the Civil Rights Act of 1964)  
(Name the defendants who violated it: United Healthcare / Jennifer Q. [illegible])  
[Explain briefly here what the law is, what each defendant did to violate it, and how you were harmed. You do not need to make legal arguments. You can refer back to your statement of facts.]

I was wrongfully terminated in 12/2023. Due to ~~STAO~~ racial bias and discriminatory practices that violated this law. I lost my lively hood, I lost everything due to lack of income. I was already making less than my white counterparts. Working harder than most. I have disabilities that affect my learning and comprehension. I also develop ~~the~~ anxiety and depression while working at UHC with Jennifer Q. as my ~~the~~ supervisor. While in training I was ridiculed and laughed at. Because of my dyslexia, I even had 1 white woman say "Yvonne you had us all fooled" What does that mean? I had IT issues for over 2 weeks and Jennifer did not want to assist so I went to the Director to protect myself and did receive the help I needed. UHC was found the IT issues were on UHC's equipment + ISP yet Jennifer Q still terminated me, framed as company policy. Because my voice wasn't heard because I was discounted because of my race.



2nd

Claim

(Name the law or right violated:

(Name the defendants who violated it:

The Rehabilitation Act of 1973,

Section 504

Jenniker Q / UHC

1. United Health Care Group

2. Jenniker Quesenberg

**DEMAND FOR RELIEF**

[State what you want the Court to do. Depending on your claims, you may ask the Court to award you money or order the defendant to do something or stop doing something. If you are asking for money, you can say how much you are asking for and why you should get that amount, or describe the different kinds of harm caused by the defendant.]

1. Compensation for lost wages & benefits, including back pay and front pay. Since I have been unemployed for 2 years.

2. Compensation for emotional distress and punitive damages to deter further discriminatory practices.

**DEMAND FOR JURY TRIAL**

[Check this box if you want your case to be decided by a jury, instead of a judge, if allowed.]

☒ Plaintiff demands a jury trial on all issues.

Respectfully submitted,

Date:

5/9/2025

Sign Name:

Print Name:

Yvonne DeJesus  
Yvonne DeJesus

1 *[Copy this page and insert it where you need additional space.]*

2 \_\_\_\_\_.

3 \_\_\_\_\_

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28 \_\_\_\_\_



## U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

**Las Vegas Local Office**  
333 Las Vegas Blvd South, Suite 5560  
Las Vegas, NV 89101  
(702) 553-4470  
Website: [www.eeoc.gov](http://www.eeoc.gov)

### **DETERMINATION AND NOTICE OF RIGHTS**

(This Notice replaces EEOC FORMS 161, 161-A & 161-B)

Issued On: 02/13/2025

**To:** Ms. Yvonne Dejesus  
7558 Whitman Colonial St  
LAS VEGAS, NV 89166  
Charge No: 487-2024-00641

EEOC Representative and email: KATHY AVILA  
Federal Investigator  
Kathy.Avila@eeoc.gov

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### **DETERMINATION OF CHARGE**

The EEOC issues the following determination: The EEOC will not proceed further with its investigation and makes no determination about whether further investigation would establish violations of the statute. This does not mean the claims have no merit. This determination does not certify that the respondent is in compliance with the statutes. The EEOC makes no finding as to the merits of any other issues that might be construed as having been raised by this charge.

### **NOTICE OF YOUR RIGHT TO SUE**

This is official notice from the EEOC of the dismissal of your charge and of your right to sue. If you choose to file a lawsuit against the respondent(s) on this charge under federal law in federal or state court, **your lawsuit must be filed WITHIN 90 DAYS of your receipt of this notice.** Receipt generally occurs on the date that you (or your representative) view this document. You should keep a record of the date you received this notice. Your right to sue based on this charge will be lost if you do not file a lawsuit in court within 90 days. (The time limit for filing a lawsuit based on a claim under state law may be different.)

If you file a lawsuit based on this charge, please sign in to the EEOC Public Portal and upload the court complaint to charge 487-2024-00641.

On behalf of the Commission,

Digitally Signed By: Michael Mendoza  
02/13/2025

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Michael Mendoza  
Local Office Director

Enclosure with EEOC Notice of Closure and Rights (01/22)

District Director at Christine Park-Gonzalez, 255 East Temple St 4th Floor, Los Angeles, CA 90012.

**To make a Section 83 request for your charge file**, submit a signed written request stating it is a "Section 83 Request" for Charge Number 487-2024-00641 to the District Director at Christine Park-Gonzalez, 255 East Temple St 4th Floor, Los Angeles, CA 90012.

You may request the charge file up to 90 days after receiving this Notice of Right to Sue. After the 90 days have passed, you may request the charge file only if you have filed a lawsuit in court and provide a copy of the court complaint to EEOC.

For more information on submitting FOIA requests, go to <https://www.eeoc.gov/eeoc/foia/index.cfm>.

For more information on submitted Section 83 requests, go to <https://www.eeoc.gov/foia/section-83-disclosure-information-charge-files>.

#### **NOTICE OF RIGHTS UNDER THE ADA AMENDMENTS ACT OF 2008 (ADAAA)**

The ADA was amended, effective January 1, 2009, to broaden the definitions of disability to make it easier for individuals to be covered under the ADA/ADAAA. A disability is still defined as (1) a physical or mental impairment that substantially limits one or more major life activities (actual disability); (2) a record of a substantially limiting impairment; or (3) being regarded as having a disability. *However, these terms are redefined, and it is easier to be covered under the new law.*

If you plan to retain an attorney to assist you with your ADA claim, we recommend that you share this information with your attorney and suggest that he or she consult the amended regulations and appendix, and other ADA related publications, available at: [http://www.eeoc.gov/laws/types/disability\\_regulations.cfm](http://www.eeoc.gov/laws/types/disability_regulations.cfm).

#### **“Actual” disability or a “record of” a disability**

If you are pursuing a failure to accommodate claim you must meet the standards for either “actual” or “record of” a disability:

- ☐ **The limitations from the impairment no longer must be severe or significant** for the impairment to be considered substantially limiting.
- ☐ In addition to activities such as performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, thinking, concentrating, reading, bending, and communicating (more examples at 29 C.F.R. § 1630.2(i)), **“major life activities” now include the operation of major bodily functions**, such as: functions of the immune system, special sense organs and skin; normal cell growth; and digestive, genitourinary, bowel, bladder, neurological, brain, respiratory, circulatory, cardiovascular, endocrine, hemic, lymphatic, musculoskeletal, and reproductive functions; or the operation of an individual organ within a body system.
- ☐ **Only one** major life activity need be substantially limited.
- ☐ Except for ordinary eyeglasses or contact lenses, the beneficial effects of **“mitigating measures”** (e.g., hearing aid, prosthesis, medication, therapy, behavioral modifications)

Enclosure with EEOC Notice of Closure and Rights (01/22)

## **INFORMATION RELATED TO FILING SUIT UNDER THE LAWS ENFORCED BY THE EEOC**

*(This information relates to filing suit in Federal or State court **under Federal law**. If you also plan to sue claiming violations of State law, please be aware that time limits may be shorter and other provisions of State law may be different than those described below.)*

### **IMPORTANT TIME LIMITS – 90 DAYS TO FILE A LAWSUIT**

If you choose to file a lawsuit against the respondent(s) named in the charge of discrimination, you must file a complaint in court **within 90 days of the date you receive this Notice**. Receipt generally means the date when you (or your representative) opened this email or mail. You should **keep a record of the date you received this notice**. Once this 90-day period has passed, your right to sue based on the charge referred to in this Notice will be lost. If you intend to consult an attorney, you should do so promptly. Give your attorney a copy of this Notice, and the record of your receiving it (email or envelope).

If your lawsuit includes a claim under the Equal Pay Act (EPA), you must file your complaint in court within 2 years (3 years for willful violations) of the date you did not receive equal pay. This time limit for filing an EPA lawsuit is separate from the 90-day filing period under Title VII, the ADA, GINA, the ADEA, or the PWFA referred to above. Therefore, if you also plan to sue under Title VII, the ADA, GINA, the ADEA or the PWFA, in addition to suing on the EPA claim, your lawsuit must be filed within 90 days of this Notice and within the 2- or 3-year EPA period.

Your lawsuit may be filed in U.S. District Court or a State court of competent jurisdiction. Whether you file in Federal or State court is a matter for you to decide after talking to your attorney. You must file a "complaint" that contains a short statement of the facts of your case which shows that you are entitled to relief. Filing this Notice is not enough. For more information about filing a lawsuit, go to <https://www.eeoc.gov/employees/lawsuit.cfm>.

### **ATTORNEY REPRESENTATION**

For information about locating an attorney to represent you, go to:  
<https://www.eeoc.gov/employees/lawsuit.cfm>.

In very limited circumstances, a U.S. District Court may appoint an attorney to represent individuals who demonstrate that they are financially unable to afford an attorney.

### **HOW TO REQUEST YOUR CHARGE FILE AND 90-DAY TIME LIMIT FOR REQUESTS**

There are two ways to request a charge file: 1) a Freedom of Information Act (FOIA) request or 2) a "Section 83" request. You may request your charge file under either or both procedures. EEOC can generally respond to Section 83 requests more promptly than FOIA requests.

Since a lawsuit must be filed within 90 days of this notice, please submit your FOIA and/or Section 83 request for the charge file promptly to allow sufficient time for EEOC to respond and for your review.

**To make a FOIA request for your charge file**, submit your request online at <https://eeoc.arkcase.com/foia/portal/login> (this is the preferred method). You may also submit a FOIA request for your charge file by U.S. Mail by submitting a signed, written request identifying your request as a "FOIA Request" for Charge Number 487-2024-00641 to the

Enclosure with EEOC Notice of Closure and Rights (01/22)

**are not considered** in determining if the impairment substantially limits a major life activity.

- ☐ An impairment that is **“episodic”** (e.g., epilepsy, depression, multiple sclerosis) or **“in remission”** (e.g., cancer) is a disability if it **would be substantially limiting when active**.
- ☐ An impairment **may be substantially limiting even though** it lasts or is expected to last **fewer than six months**.

#### **“Regarded as” coverage**

An individual can meet the definition of disability if an **employment action was taken because of an actual or perceived impairment** (e.g., refusal to hire, demotion, placement on involuntary leave, termination, exclusion for failure to meet a qualification standard, harassment, or denial of any other term, condition, or privilege of employment).

- ☐ “Regarded as” coverage under the ADAAA no longer requires that an impairment be substantially limiting, or that the employer perceives the impairment to be substantially limiting.
- ☐ The employer has a defense against a “regarded as” claim only when the impairment at issue is objectively **both** transitory (lasting or expected to last six months or less) **and** minor.
- ☐ A person is not able to bring a failure to accommodate claim **if** the individual is covered only under the “regarded as” definition of “disability”.

**Note:** *Although the amended ADA states that the definition of disability “shall be construed broadly” and “should not demand extensive analysis,” some courts require specificity in the complaint explaining how an impairment substantially limits a major life activity or what facts indicate the challenged employment action was because of the impairment. Beyond the initial pleading stage, some courts will require specific evidence to establish disability. For more information, consult the amended regulations and appendix, as well as explanatory publications, available at [http://www.eeoc.gov/laws/types/disability\\_regulations.cfm](http://www.eeoc.gov/laws/types/disability_regulations.cfm).*



**Cc:**

Ann Tollefson  
UnitedHealth Group  
9900 BREN RD E  
Minnetonka, MN 55343

7558 Whitman Colonial st  
Las Vegas, NV 89166

Randi Halbert  
Seyfarth Shaw LLP  
233 S WACKER DR STE 8000  
Chicago, IL 60606

Please retain this notice for your records.

## **Statement on Racial Discrimination and Unjust Termination**

It is disheartening and frustrating to find myself in a situation where I was terminated for what was framed as a violation of company policy, particularly when the issue was related to technical difficulties that were beyond my control. Despite escalating my VPN issues to IT and being unable to make or receive calls for over a week due to these technical failures, I was terminated, leaving me to believe that this decision may have been racially motivated.

When a large corporation like UnitedHealthcare, the biggest in the U.S., terminates an employee of color under questionable circumstances, the imbalance in power and resources between the company and the individual becomes glaringly obvious. It often feels like a "David and Goliath" situation—one individual standing up against an institution that wields significant power, influence, and resources.

In such cases, companies frequently claim that no discrimination took place. From their perspective, they follow policies and procedures, and these protocols are supposed to apply equally to everyone. But the lived experience of many people of color tells a different story. Racism in the workplace isn't always about overt slurs or blatant actions—it can be subtle, embedded in the way certain employees are treated when they raise concerns, are denied fair opportunities, or, as in my case, are terminated for something beyond their control.

A person of color can easily feel targeted when they are held to a different standard than their non-POC colleagues, or when issues like technical problems, which should have been acknowledged and rectified by the company, are used as grounds for termination. The supervisor's decision to fire me—without considering the legitimate technical difficulties I faced—raises serious concerns about whether I was treated fairly, especially when these same circumstances might have been handled differently for a non-POC colleague.

The truth is, corporations often try to shield themselves behind policies and data that ostensibly prove that no racial bias exists in their decisions. But what they fail to address are the unconscious biases that persist, the differential treatment, and the barriers that many people of color continue to face in the workplace. It's easy for companies to assert that there was no racial discrimination, especially when they control the narrative, hold the power, and rely on their vast legal resources.

But to dismiss the possibility of racial discrimination in my case ignores the broader societal context in which people of color often have to navigate additional challenges in the workplace. The system itself is often rigged against us, and large corporations are skilled at deflecting accusations of racism, even when the patterns of unequal treatment are clear to those experiencing it.

In essence, it is not just about a policy violation. It is about how those policies are applied and to whom. It's about recognizing the power dynamics in place and understanding that discrimination can manifest in subtle, yet harmful, ways. As an individual facing the full weight of a powerful corporation, I am left with the sense that I was not just terminated for a technical issue—I was

dismissed because of who I am and the color of my skin, in a company that is, quite frankly, too big to see the damage they've caused to one person.

## UHC SYSTEM Error no Internet

Inbox

Search for all messages with label Inbox

Remove label Inbox from this conversation



Wed, Nov 29,  
2023, 10:13 AM

**Yvi DeJesus**

**<dejesusyvi3@gmail.com>**

to

jennifer\_queensberry

Hello Jennifer I'm trying very hard to get back up and in.. I'm having an issue connecting with IT.

I'm here trying I knew I did more damage yesterday by continuing to work as per closing sup.

This is not my fault but something wit UHC system VPN Network no Internet.

Please I'm sorry my computer is restarting now

This is Yvi

The actions taken against me to have me terminated were racially motivated. Jennifer Q and all other parties involved made up lies against me. I am black and it was very easy to fabricate these scenarios. Review the emails submitted as evidence shows the IT issues I experienced were escalated to a specialist and took a week to resolve. I did follow the company policy. I am black and Jennifer Q wanted to end my employment over something so she created the entire EOM story. I shared personal pictures and information about my home and my life. I posted pictures of my BMW in the TEAMS chat. I posted a picture of myself on a yacht in the TEAMS chat. I shared pictures of my beautiful home. At Jennifer Q's request. This is when Jennifer Q's attitude towards me changed. I know she was very shocked that a black woman on her team has a nice home and car. Jennifer asked the team to post a picture of our dream vacations. I'm sure she could not believe it. Jennifer was so intrigued with me she and Kristin would sit in meetings and try to guess how old I was. Why would my age be of any concern? I will tell you I am a beautiful black woman that does not look my age. Again why would she and Kristin care about my age? Also I did not do all that shucking and jiving like the other black young ladies on the team did. Which again Jennifer found so funny. Laughing at them rather laughing with them. On one occasion I was very vulnerable and shared with Jennifer Q how unhappy I was because I did not make enough money. Jennifer Q knew I was interviewing for another position internally and I believed she did not want me to get a better

position that paid more money. I feel Jennifer Q did not want me to get a better position. Again, I feel it was racially motivated. Jennifer Q would allow a white lady. I believe her name is Denise, the white lady that lied on me about the EOM. Cursed in the TEAMS chat. Jennifer Q requested a one on one with me when she claimed I was not having the IT issues I was having. I was so frustrated and expressed how I was feeling. Jennifer Q said I was disrespectful to her. Creating the angry black woman scenario. But I am supposed to allow someone to lie on me. About what I was experiencing. Again I felt I was discounted because I am black. Jennifer Q wanted to see me suffer and perhaps lose my home and the wonderful life I created for myself. Jennifer Q has had a tough life dealing with drug addiction and being jailed. I believe again she is angry a black woman did not have those types of issues in life. A black woman cannot have anything? NO which is why she did not want to be a mentor to me. I am not going to allow anyone to discount what I experience and feel. Jennifer Q is racist. I believe her son had a Confederate flag on his truck. When she shared a picture of her son in some sort of Christmas parade.